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Attorney for defendant
Kimberly Wallace

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICKY LEE WARE,
KIMBERLY ANN WALLACE and
CARLOS LEE SANCHEZ, JR.,

Defendants.

CASE NO. 2:24-CR-281-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
~~PROPOSED~~ ORDER

DATE: July 18, 2025
TIME: 9:30 a.m.
COURT: Hon. Dena Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on July 18, 2025.
2. By this stipulation, defendants now move to continue the status conference until September 12, 2025, and to exclude time between July 18, 2025, and September 12, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery in this matter, to date, consisting of over 52,000 pages of investigative reports, photographs and video surveillance evidence and 3000 native files. The government has begun producing (electronic) copies and/or extraction reports related to the eight seized electronic devices (adding a significant volume of discovery to the

1 already substantial amount of discovery previously produced by the government).

2 b) Counsel for defendants have met with their clients to discuss their respective
3 cases. Defense counsel desire additional time to conduct investigation into the charges, the
4 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
5 will need additional time to discuss potential resolutions with their clients, prepare pretrial
6 motions, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of July 18, 2025 to September 12,
16 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
17 T4] because it results from a continuance granted by the Court at defendant's request on the basis
18 of the Court's finding that the ends of justice served by taking such action outweigh the best
19 interest of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.

24
25 Dated: June 24, 2025

26 /s/ LINDA PARISI
27 LINDA PARISI
28 Counsel for Defendant
RICKY LEE WARE

1 Dated: June 24, 2025

/s/ CANDICE L. FIELDS
CANDICE L. FIELDS
Counsel for Defendant
KIMBERLY ANN WALLACE

4 Dated: June 24, 2025

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
CARLOS LEE SANCHEZ, Jr

8 Dated: June 24, 2025

MICHELE BECKWITH
Acting United States Attorney


9 /s/ NICHOLAS M. FOGG
10 NICHOLAS M. FOGG
Assistant United States Attorney

ORDER

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, ADOPTS the parties' stipulation. Accordingly, the Status Conference scheduled for July 18, 2025, at 9:30 a.m. is VACATED and RESET for September 12, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period between July 18, 2025 and September 12, 2025 inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: **June 30, 2025**


Dena Coggins
United States District Judge